

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

AVILA FLORES, Reyna Isabel

Plaintiff,

v.

RABABEH, Kheder

Defendant

Case No: 1:15-cv-1415-TSE-TCB

Hearing Date: Friday June 24
10:00 a.m.

**Motion for Attorney's Fees
And Notice of Hearing**

PLEASE TAKE NOTICE that on Friday, June 24 at 10:00 a.m., or as soon thereafter as the matter may be heard, Plaintiff will move for an award of her attorney's fees in this action.

Under the Fair Labor Standards Act, prevailing plaintiffs are entitled to their reasonable attorney's fees. 29 U.S.C. § 216(b). While Plaintiff has not yet been granted judgment in her favor, she has filed a motion in support of default judgment (ECF No. 15), and the Court has instructed her to file a motion for fees now.

As shown in the supporting memorandum of law, accompanied by declarations from counsel, Plaintiff's attorneys have used diligence and discretion in determining both their reasonable hours expended on the case and their reasonable hourly rate. Accordingly, Plaintiff now seeks statutory attorney's fees in the amount of \$11,088.

Respectfully submitted,

LEGAL AID JUSTICE CENTER

By: //s//Nicholas Cooper Marritz
Nicholas Cooper Marritz (VSB No. 89795)
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: (703) 778-3450 × 607
Fax: (703) 778-3454
nicholas@justice4all.org
Counsel for Plaintiff

Date: June 13, 2016

Certificate of Service

I hereby certify that I uploaded **Plaintiff's Motion for Attorney's Fees and Notice of Hearing** to the Court's CM/ECF system today, June 13, 2016, causing a notice of electronic filing to be sent to all counsel of record.

I also sent a copy to the following non-CM/ECF participants today by U.S. Mail:

Kheder Rababeh
5006 Terrell St.
Annandale, VA 22003

Michael Hadeed, Jr
Hadeed Law Group, P.C.
510 King Street, Suite 400
Alexandria, VA 22314
Counsel for Imad Rababeh

//s// Nicholas Cooper Marritz
Nicholas Cooper Marritz (VSB No. 89795)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: (703) 778-3450 x 607
Fax: (703) 778-3454
nicholas@justice4all.org
Counsel for Plaintiff

Date: June 13, 2016